## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

STIPULATION FOR SECOND ORDER EXTENDING DEADLINE FOR THE ELECTRICAL WORKERS' PENSION TRUST FUND OF LOCAL UNION # 58, I.B.E.W., DETROIT, MICHIGAN AND THE SHEET METAL WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND TO FILE THEIR RESPONSE IN OPPOSITION CITY OF DETROIT'S MOTION TO ENFORCE CONFIRMATION ORDER AGAINST THE SHEET METAL WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND AND ELECTRICAL WORKERS' PENSION TRUST FUND OF LOCAL UNION #58, I.B.E.W., DETROIT MICHIGAN [DOC. NO. 13308]

The City of Detroit, Michigan ("<u>City</u>") and the Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit, Michigan and the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund (together, the "Pension Funds"), by their undersigned counsel, hereby stipulate and agree as follows:

- 1. On August 28, 2020, the City filed the City of Detroit's Motion to Enforce the Confirmation Order Against the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund and Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit Michigan (the "Motion to Enforce") [Doc. No. 13308].
- 2. Since the Motion to Enforce was filed, the City and the Pension Funds have exchanged certain information relevant to the relief sought by the Motion to Enforce in an effort to narrow the issues before the Court.

3. The current, previously extended deadline for the Pension Funds to file their response to the Motion to Enforce is Friday, September 25, 2020.

4. The Pension Funds have requested and the City has agreed, subject to this Court's approval, to a brief, further extension of the deadline for the Pension Funds to file their response to the Motion to Enforce through and including Thursday, October 1, 2020.

WHEREFORE, the City and the Pension Funds respectfully request that the Court enter an order in substantially the same form as the one attached as Exhibit 1 extending the deadline for the Pension Funds to file their response to the Motion to Enforce through and including Wednesday, October 1, 2020.

## STIPULATED AND AGREED TO ON September 24, 2020:

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## **EXHIBIT 1**

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
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SECOND ORDER EXTENDING DEADLINE FOR THE ELECTRICAL WORKERS' PENSION TRUST FUND OF LOCAL UNION # 58, I.B.E.W., DETROIT, MICHIGAN AND THE SHEET METAL WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND TO FILE THEIR RESPONSE IN OPPOSITION CITY OF DETROIT'S MOTION TO ENFORCE CONFIRMATION ORDER AGAINST THE SHEET METAL WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND AND ELECTRICAL WORKERS' PENSION TRUST FUND OF LOCAL UNION #58, I.B.E.W., DETROIT MICHIGAN [DOC. NO. 13308]

This matter is before the Court on the Stipulation for Second Order Extending Deadline for the Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit, Michigan and the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund (together, the "Pension Funds") to File Their Response to the City of Detroit's Motion to Enforce the Confirmation Order Against the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund and Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit Michigan (the "Motion to Enforce") [Doc. No. \_\_\_\_\_]. The Court has read the stipulation and finds good cause to enter this Order.

IT IS ORDERED that the deadline for the Pension Funds to file their response to the Motion to Enforce is extended from Friday, September 25, 2020 through and including Thursday, October 1, 2020.